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Attorneys for Defendants:

CITIGROUP I/S/H/A CITIBANK, N.A., STATE STREET BANK
AND TRUST COMPANY AS OWNER TRUSTEE OF ZSF/OFFICE
NY TRUST (solely in connection with their alleged ownership or occupancy
of 111 Wall Street), 111 WALL STREET, LLC (solely in connection with
their alleged ownership or occupancy of 111 Wall Street) and
230 CENTRAL CO., LLC (solely in connection with their alleged ownership
or occupancy of 111 Wall Street),

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
DOMINIK DROZDZ (AND WIFE, EWA DROZDZ)

Plaintiffs,

-against-

111 WALL STREET LLC, ET. AL.

21 MC 102 (AKH)

Index No.: 06-CV-14619

**NOTICE OF ADOPTION OF ANSWER
TO MAST COMPLAINT**

ELECTRONICALLY FILED

Defendants.

-----X

PLEASE TAKE NOTICE, that defendants, CITIGROUP I/S/H/A CITIBANK, N.A., STATE
STREET BANK AND TRUST COMPANY AS OWNER TRUSTEE OF ZSF/OFFICE NY TRUST
(solely in connection with their alleged ownership or occupancy of 111 Wall Street), 111 WALL
STREET, LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street) and
230 CENTRAL CO., LLC (solely in connection with their alleged ownership or occupancy of 111 Wall
Street), by their attorneys, White & McSpedon, P.C., as and for their Response to the allegations set
forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the
above-referenced action, hereby adopt their Answer to Master Complaint dated July 31, 2007, which

was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendants, CITIGROUP I/S/H/A CITIBANK, N.A., STATE STREET BANK AND TRUST COMPANY AS OWNER TRUSTEE OF ZSF/OFFICE NY TRUST (solely in connection with their alleged ownership or occupancy of 111 Wall Street), 111 WALL STREET, LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street) and 230 CENTRAL CO., LLC (solely in connection with their alleged ownership or occupancy of 111 Wall Street), demand judgment dismissing the above-captioned action as against them, together with their costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
September 5, 2008

Yours etc.,

WHITE & MCSPEDON, P.C.

By:



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TO:
(Service via electronic Pacer filing)

WORBY GRONER & NAPOLI BERN, LLP
Plaintiffs Liaison
In Re Lower Manhattan Disaster Site Litigation
115 Broadway, 12th Floor
New York, NY 10006
212-267-3700

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All Defense Counsel